



AT&T

Room 5462B3

295 North Maple Avenue
Basking Ridge, NJ 07920

May 12, 1999

Mr. Robert Mazer
Mr. Albert Shuldiner
Vinson & Elkins, L.L.P.
1445 Pennsylvania Avenue, NW
Washington, DC 20004

**Re: Proprietary Data submitted by Aliant to the FCC in:
CC Docket No. 96-45 – Universal Service/Proxy Cost Models
CC Docket No. 97-160 – Forward-Looking Cost Mechanism**

Dear Mr. Mazer:

Based on ex parte and other filings that Aliant has made with the Federal Communications Commission in the above-captioned dockets, AT&T and MCI WorldCom understand that Aliant has provided the Commission with certain data that it believes are proprietary. These data pertain to the costs that Aliant incurs for the purchase, installation and operation of equipment used in its local exchange networks – or other costs including overheads. This may include information about the purchase and installation cost of end office or tandem switches, digital loop carrier systems, transmission systems, and/or the cost of outside plant elements such as cable and its placement, connectors, protectors, splicing, etc. Further information may have been provided on the quantities required of these pieces of a local network (e.g., loop and drop lengths, structure type and sharing percentages, etc.) Attached to the last page of this letter is a brief description of some, but quite possibly not all, of the proprietary data that Aliant may have provided to the Commission.

Because AT&T and MCI WorldCom would like to be able to provide the Commission with an evaluation of the accuracy and relevance of these proprietary data for the purpose of establishing the forward-looking economic costs of local exchange networks, we request the opportunity to review these data pursuant to the Common Carrier Bureau's *Protective Order*.⁹ In the event that these data were submitted to the Commission under protective restrictions different from those stated in the *Protective Order*, AT&T and MCI WorldCom request that the status of these data be changed so as

⁹ This *Protective Order* was issued in CC Docket Nos. 96-45 and 97-160 on July 27, 1998 as DA 98-1490 (13 FCC Rcd. 13910 (1998)).

Mr. Robert Mazer
May 12, 1999
Page 2

to be subject to inspection under the terms of the *Protective Order*. As informally agreed to among the parties, we request to inspect these data in Washington, D.C. – unless the volume or format of these data make that location impossible.

We would like to inspect these data as soon as possible, preferably during the week of May 17 to May 21. Could you please propose a date and time that would be convenient. Upon establishing this appointment, we will be happy to provide you with names of the AT&T and MCI WorldCom representatives who will inspect the data – and provide you with copies of the Declarations that each of these representatives has executed stating that they will abide by the terms of the *Protective Order*.

Thank you very much for your attention to this request. Please contact us if you have any questions. Richard Clarke may be reached at the above address, or by telephone at 908-221-8685, by fax at 908-221-4628, or email at rnclarke@att.com. Chris Frentrup may be reached at MCI WorldCom, 1801 Pennsylvania Avenue, NW, Washington, DC 20006, or by telephone at 202-887-2731, by fax at 202-887-3070, or email at Christopher.J.Frentrup@mci.com.

Sincerely,



Richard N. Clarke
AT&T



Chris Frentrup
MCI WorldCom

cc: Craig Brown, FCC

Partial List of Data Items

1. All information provided to the Commission pursuant to its July 9, 1997 Data Request *Order* in CC Docket No. 96-45 and its July 19, 1997 *Errata*.
2. All information provided to the Commission pursuant to its "Outside Plant Structure and Cable Costs" *Data Collection Request* that was issued on or about December 14, 1998.
3. Any other information provided to the Commission under proprietary cover in CC Docket Nos. 96-45 and 97-160 concerning the costs, input prices or equipment quantities associated with local telephone networks.



AT&T
Room 5462B3

295 North Maple Avenue
Basking Ridge, NJ 07920

May 27, 1999

Mr. Pete Sywenki
Director, Federal Regulatory Affairs
Sprint
1850 M Street, NW - Suite 1100
Washington, DC 20036

**Re: Proprietary Data submitted to the FCC in:
CC Docket No. 96-45 – Universal Service/Proxy Cost Models
CC Docket No. 97-160 – Forward-Looking Cost Mechanism**

Dear Pete:

It is AT&T and MCI WorldCom's understanding that Sprint has provided the Commission with copies of certain of its vendor contracts covering purchases of various pieces of network equipment such as switches, digital loop carrier systems, copper or fiber cables, etc. Unfortunately, no contracts of this type were available for our inspection when we visited Sprint last week. AT&T and MCI WorldCom would like to again request the opportunity (pursuant to the Common Carrier Bureau's *Protective Order*) to review any vendor contract copies or information that Sprint has filed in the above-captioned dockets.

If our information is incorrect and Sprint has not filed any such vendor contract information with the Commission, could you please state that in a written response.

Thank you very much for your attention to this request. Please contact us if you have any questions. Richard Clarke may be reached at the above address, or by telephone at 908-221-8685, by fax at 908-221-4628, or email at rnclarke@att.com. Chris Frentrup may be reached at MCI WorldCom, 1801 Pennsylvania Avenue, NW, Washington, DC 20006, or by telephone at 202-887-2731, by fax at 202-887-3070, or email at Christopher.J.Frentrup@wcom.com.

Sincerely,

Richard N. Clarke
AT&T

Chris Frentrup
MCI WorldCom

cc: Craig Brown, FCC



Recycled Paper

**AT&T**

Room 5462B3

295 North Maple Avenue
Basking Ridge, NJ 07920

May 27, 1999

Ms. Hope Thurrott
Senior Counsel
SBC
One Bell Plaza, Room 3023
Dallas, TX 75202

**Re: Proprietary Data submitted to the FCC in:
CC Docket No. 96-45 – Universal Service/Proxy Cost Models
CC Docket No. 97-160 – Forward-Looking Cost Mechanism**

Dear Ms. Thurrott:

Thank you for your letter of May 24, 1999. AT&T and MCI WorldCom appreciate your efforts to assemble this information for our review. We do, also, request the opportunity to review any vendor-specific confidential information (e.g., switch contracts, digital loop carrier contracts, copper or fiber cable contracts, etc.) that SBC may have filed in the above dockets. We believe that our review of these materials is also covered under the terms of the Common Carrier Bureau's *Protective Order*.

We shall be pleased to provide Mr. Bennett with the necessary declarations. Thanks again for your assistance. Please contact us if you have any questions. Richard Clarke may be reached at the above address, or by telephone at 908-221-8685, by fax at 908-221-4628, or email at rnclarke@att.com. Chris Frentrup may be reached at MCI WorldCom, 1801 Pennsylvania Avenue, NW, Washington, DC 20006, or by telephone at 202-887-2731, by fax at 202-887-3070, or email at Christopher.J.Frentrup@wcom.com.

Sincerely,

Richard N. Clarke
AT&T

Chris Frentrup
MCI WorldCom

cc: Craig Brown, FCC



Recycled Paper



AT&T

Room 5462B3

295 North Maple Avenue
Basking Ridge, NJ 07920

June 9, 1999

Mr. Robert McKenna
Associate General Counsel
U S West
1801 California Street, Suite 5100
Denver, CO 80202

**Re: Proprietary Data submitted to the FCC in:
CC Docket No. 96-45 – Universal Service/Proxy Cost Models
CC Docket No. 97-160 – Forward-Looking Cost Mechanism**

Dear Mr. McKenna:

In our letter of May 12, 1999, AT&T and MCI WorldCom requested the opportunity to inspect the proprietary data that U S West has provided the Federal Communications Commission in the above-captioned proceedings on forward-looking cost models for universal service. These data likely pertain to the required quantities and costs of local exchange network equipment, structures and/or operating expenses. They may include both U S West's survey responses to Commission data requests, as well as its copies of vendor contracts.¹ While we appreciate the efforts that U S West may currently be undertaking to assemble these data, as of today's date, AT&T and MCI WorldCom have yet to be provided with an appointment to inspect these data.

As you are aware, on May 28, 1999, the Commission released its *Further Notice of Proposed Rulemaking* in the above proceedings. In this *FNPRM*, the Commission proposes to base certain of its decisions on cost model input values on the proprietary data that U S West may have provided to the Commission. Because the due date for comments on the *FNPRM*, is July 2, 1999, it is critical for AT&T and MCI WorldCom to examine these data within the next two weeks. We would appreciate your quick response to this request.

¹ A fuller description of these data was provided in our earlier letter.

Mr. Robert McKenna
June 9, 1999
Page 2

Please contact either of us if you have any questions. Richard Clarke may be reached at the above address, or by telephone at 908-221-8685, by fax at 908-221-4628, or email at rnclarke@att.com. Chris Frentrup may be reached at MCI WorldCom, 1801 Pennsylvania Avenue, NW, Washington, DC 20006, or by telephone at 202-887-2731, by fax at 202-887-3070, or email at Christopher.J.Frentrup@wcom.com.

Sincerely,



Richard N. Clarke
AT&T



Chris Frentrup
MCI WorldCom

cc: Craig Brown, FCC



AT&T

Room 5462B3

295 North Maple Avenue
Basking Ridge, NJ 07920

June 9, 1999

Mr. W. Scott Randolph
Director - Regulatory Matters
GTE
1850 M Street, NW - Suite 1200
Washington, DC 20036

**Re: Proprietary Data submitted to the FCC in:
CC Docket No. 96-45 – Universal Service/Proxy Cost Models
CC Docket No. 97-160 – Forward-Looking Cost Mechanism**

Dear Mr. Randolph:

In our letter of May 12, 1999, AT&T and MCI WorldCom requested the opportunity to inspect the proprietary data that GTE has provided the Federal Communications Commission in the above-captioned proceedings on forward-looking cost models for universal service. These data likely pertain to the required quantities and costs of local exchange network equipment, structures and/or operating expenses. They may include both GTE's survey responses to Commission data requests, as well as its copies of vendor contracts.² While we appreciate the efforts that GTE may currently be undertaking to assemble these data, as of today's date, AT&T and MCI WorldCom have yet to be provided with an appointment to inspect these data.

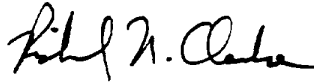
As you are aware, on May 28, 1999, the Commission released its *Further Notice of Proposed Rulemaking* in the above proceedings. In this *FNPRM*, the Commission proposes to base certain of its decisions on cost model input values on the proprietary data that GTE may have provided to the Commission. Because the due date for comments on the *FNPRM*, is July 2, 1999, it is critical for AT&T and MCI WorldCom to examine these data within the next two weeks. We would appreciate your quick response to this request.

² A fuller description of these data was provided in our earlier letter.

Mr. W. Scott Randolph
June 9, 1999
Page 2

Please contact either of us if you have any questions. Richard Clarke may be reached at the above address, or by telephone at 908-221-8685, by fax at 908-221-4628, or email at rnclarke@att.com. Chris Frentrup may be reached at MCI WorldCom, 1801 Pennsylvania Avenue, NW, Washington, DC 20006, or by telephone at 202-887-2731, by fax at 202-887-3070, or email at Christopher.J.Frentrup@wcom.com.

Sincerely,



Richard N. Clarke
AT&T



Chris Frentrup
MCI WorldCom

cc: Craig Brown, FCC



AT&T

Room 5462B3

295 North Maple Avenue
Basking Ridge, NJ 07920

June 9, 1999

Ms. Celia Nogales
Director - Federal Relations
Ameritech
1401 H Street, NW - Suite 1020
Washington, DC 20005

**Re: Proprietary Data submitted to the FCC in:
CC Docket No. 96-45 – Universal Service/Proxy Cost Models
CC Docket No. 97-160 – Forward-Looking Cost Mechanism**

Dear Ms. Nogales:

In our letter of May 12, 1999, AT&T and MCI WorldCom requested the opportunity to inspect the proprietary data that Ameritech has provided the Federal Communications Commission in the above-captioned proceedings on forward-looking cost models for universal service. These data likely pertain to the required quantities and costs of local exchange network equipment, structures and/or operating expenses. They may include both Ameritech's survey responses to Commission data requests, as well as its copies of vendor contracts.³ While we appreciate the efforts that Ameritech may currently be undertaking to assemble these data, as of today's date, AT&T and MCI WorldCom have yet to be provided with an appointment to inspect these data.

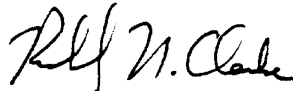
As you are aware, on May 28, 1999, the Commission released its *Further Notice of Proposed Rulemaking* in the above proceedings. In this *FNPRM*, the Commission proposes to base certain of its decisions on cost model input values on the proprietary data that Ameritech may have provided to the Commission. Because the due date for comments on the *FNPRM*, is July 2, 1999, it is critical for AT&T and MCI WorldCom to examine these data within the next two weeks. We would appreciate your quick response to this request.

³ A fuller description of these data was provided in our earlier letter.

Ms. Celia Nogales
June 9, 1999
Page 2

Please contact either of us if you have any questions. Richard Clarke may be reached at the above address, or by telephone at 908-221-8685, by fax at 908-221-4628, or email at rnclarke@att.com. Chris Frentrup may be reached at MCI WorldCom, 1801 Pennsylvania Avenue, NW, Washington, DC 20006, or by telephone at 202-887-2731, by fax at 202-887-3070, or email at Christopher.J.Frentrup@wcom.com.

Sincerely,



Richard N. Clarke
AT&T



Chris Frentrup
MCI WorldCom

cc: Craig Brown, FCC



AT&T

Room 5462B3

295 North Maple Avenue
Basking Ridge, NJ 07920

June 9, 1999

Ms. Hope Thurrott
Senior Counsel
SBC
One Bell Plaza, Room 3023
Dallas, TX 75202

**Re: Proprietary Data submitted to the FCC in:
CC Docket No. 96-45 – Universal Service/Proxy Cost Models
CC Docket No. 97-160 – Forward-Looking Cost Mechanism**

Dear Ms. Thurrott:

In our letter of May 12, 1999, AT&T and MCI WorldCom requested the opportunity to inspect the proprietary data that SBC has provided the Federal Communications Commission in the above-captioned proceedings on forward-looking cost models for universal service. These data likely pertain to the required quantities and costs of local exchange network equipment, structures and/or operating expenses. They may include both SBC's survey responses to Commission data requests, as well as its copies of vendor contracts.⁴ While we appreciate the efforts that SBC may currently be undertaking to assemble these data, as of today's date, AT&T and MCI WorldCom have yet to be provided with an appointment to inspect these data.

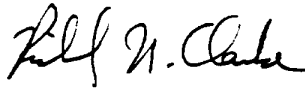
As you are aware, on May 28, 1999, the Commission released its *Further Notice of Proposed Rulemaking* in the above proceedings. In this *FNPRM*, the Commission proposes to base certain of its decisions on cost model input values on the proprietary data that SBC may have provided to the Commission. Because the due date for comments on the *FNPRM*, is July 2, 1999, it is critical for AT&T and MCI WorldCom to examine these data within the next two weeks. We would appreciate your quick response to this request.

⁴ A fuller description of these data was provided in our earlier letter.

Ms. Hope Thurrott
June 9, 1999
Page 2

Please contact either of us if you have any questions. Richard Clarke may be reached at the above address, or by telephone at 908-221-8685, by fax at 908-221-4628, or email at rnclarke@att.com. Chris Frentrop may be reached at MCI WorldCom, 1801 Pennsylvania Avenue, NW, Washington, DC 20006, or by telephone at 202-887-2731, by fax at 202-887-3070, or email at Christopher.J.Frentrop@wcom.com.

Sincerely,



Richard N. Clarke
AT&T



Chris Frentrop
MCI WorldCom

cc: Craig Brown, FCC



AT&T

Room 5462B3

295 North Maple Avenue
Basking Ridge, NJ 07920

June 9, 1999

Mr. Whit Jordan
Vice President - Federal Regulatory
BellSouth
1133 21st Street, NW - Suite 900
Washington, DC 20036

**Re: Proprietary Data submitted to the FCC in:
CC Docket No. 96-45 – Universal Service/Proxy Cost Models
CC Docket No. 97-160 – Forward-Looking Cost Mechanism**

Dear Mr. Jordan:

In our letter of May 12, 1999, AT&T and MCI WorldCom requested the opportunity to inspect the proprietary data that BellSouth has provided the Federal Communications Commission in the above-captioned proceedings on forward-looking cost models for universal service. These data likely pertain to the required quantities and costs of local exchange network equipment, structures and/or operating expenses. They may include both BellSouth's survey responses to Commission data requests, as well as its copies of vendor contracts.⁶ While we appreciate the efforts that BellSouth may currently be undertaking to assemble these data, as of today's date, AT&T and MCI WorldCom have yet to be provided with an appointment to inspect these data.

As you are aware, on May 28, 1999, the Commission released its *Further Notice of Proposed Rulemaking* in the above proceedings. In this *FNPRM*, the Commission proposes to base certain of its decisions on cost model input values on the proprietary data that BellSouth may have provided to the Commission. Because the due date for comments on the *FNPRM*, is July 2, 1999, it is critical for AT&T and MCI WorldCom to examine these data within the next two weeks. We would appreciate your quick response to this request.

⁶ A fuller description of these data was provided in our earlier letter.

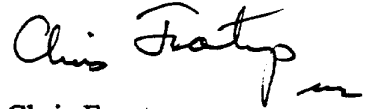
Mr. Whit Jordan
June 9, 1999
Page 2

Please contact either of us if you have any questions. Richard Clarke may be reached at the above address, or by telephone at 908-221-8685, by fax at 908-221-4628, or email at rnclarke@att.com. Chris Frentrup may be reached at MCI WorldCom, 1801 Pennsylvania Avenue, NW, Washington, DC 20006, or by telephone at 202-887-2731, by fax at 202-887-3070, or email at Christopher.J.Frentrup@wcom.com.

Sincerely,



Richard N. Clarke
AT&T



Chris Frentrup
MCI WorldCom

cc: Craig Brown, FCC



AT&T

Room 5462B3

295 North Maple Avenue
Basking Ridge, NJ 07920

June 9, 1999

Mr. Kenneth Rust
Director, Federal Regulatory Affairs
Bell Atlantic
1300 I Street, NW - Suite 400W
Washington, DC 20005

**Re: Proprietary Data submitted to the FCC in:
CC Docket No. 96-45 – Universal Service/Proxy Cost Models
CC Docket No. 97-160 – Forward-Looking Cost Mechanism**

Dear Mr. Rust:

In our letter of May 12, 1999, AT&T and MCI WorldCom requested the opportunity to inspect the proprietary data that Bell Atlantic has provided the Federal Communications Commission in the above-captioned proceedings on forward-looking cost models for universal service. These data likely pertain to the required quantities and costs of local exchange network equipment, structures and/or operating expenses. They may include both Bell Atlantic's survey responses to Commission data requests, as well as its copies of vendor contracts.⁷ While we appreciate the efforts that Bell Atlantic may currently be undertaking to assemble these data, as of today's date, AT&T and MCI WorldCom have yet to be provided with an appointment to inspect these data.

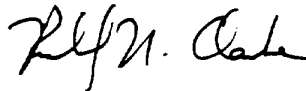
As you are aware, on May 28, 1999, the Commission released its *Further Notice of Proposed Rulemaking* in the above proceedings. In this *FNPRM*, the Commission proposes to base certain of its decisions on cost model input values on the proprietary data that Bell Atlantic may have provided to the Commission. Because the due date for comments on the *FNPRM*, is July 2, 1999, it is critical for AT&T and MCI WorldCom to examine these data within the next two weeks. We would appreciate your quick response to this request.

⁷ A fuller description of these data was provided in our earlier letter.

Mr. Kenneth Rust
June 9, 1999
Page 2

Please contact either of us if you have any questions. Richard Clarke may be reached at the above address, or by telephone at 908-221-8685, by fax at 908-221-4628, or email at rnclarke@att.com. Chris Frentrup may be reached at MCI WorldCom, 1801 Pennsylvania Avenue, NW, Washington, DC 20006, or by telephone at 202-887-2731, by fax at 202-887-3070, or email at Christopher.J.Frentrup@wcom.com.

Sincerely,



Richard N. Clarke
AT&T



Chris Frentrup
MCI WorldCom

cc: Craig Brown, FCC

**AT&T**

Room 5462B3

295 North Maple Avenue
Basking Ridge, NJ 07920

June 11, 1999

Mr. Jay Bennett
SBC Communications
1401 I Street, N.W., Room 1100
Washington, D.C. 20005

Re: Proprietary Data submitted to the FCC in:
CC Docket No. 96-45 – Universal Service/Proxy Cost Models
CC Docket No. 97-160 – Forward-Looking Cost Mechanism

Dear Mr. Bennett:

As per Ms. Thurrott's request that AT&T and MCI WorldCom provide you with our Protective Order declarations before you will arrange an appointment for us to view the proprietary documents that SBC may have submitted in the above proceedings, please find these declarations attached. If possible, we would like to inspect the available documents on Friday, June 18, but other days are possible, as well.

We appreciate your efforts to secure permission for us to view SBC's submitted vendor contracts. If they are not available prior to our viewing of the currently available documents, we would appreciate notification as soon as they do become available.

If you have any questions, Richard Clarke may be reached at the above address, or by telephone at 908-221-8685, by fax at 908-221-4628, or email at rnclarke@att.com. Chris Frentrup may be reached at MCI WorldCom, 1801 Pennsylvania Avenue, NW, Washington, DC 20006, or by telephone at 202-887-2731, by fax at 202-887-3070, or email at Christopher.J.Frentrup@wcom.com.

Sincerely,

Richard N. Clarke
AT&T

Chris Frentrup
MCI WorldCom

cc: Craig Brown, FCC (w/o atts.)
Hope Thurrott (by fax, w/o atts.)



AT&T

Room 5462B3

295 North Maple Avenue
Basking Ridge, NJ 07920

June 17, 1999

Mr. W. Scott Randolph
Director - Regulatory Matters
GTE
1850 M Street, NW - Suite 1200
Washington, DC 20036

**Re: Proprietary Data submitted to the FCC in:
CC Docket No. 96-45 – Universal Service/Proxy Cost Models
CC Docket No. 97-160 – Forward-Looking Cost Mechanism**

Dear Mr. Randolph:

Thank you for arranging for AT&T and MCI WorldCom to inspect the proprietary data that GTE has filed in the above-captioned dockets. Enclosed are:

1. signed copies of the Protective Order declarations from myself, Chris Frentrup, Michael Lieberman, Catherine Petzinger and John Donovan;
2. a signed copy of the overall Third-Party Disclosure And Use Agreement by an AT&T attorney;
3. signed copies of Appendix B to the Third-Party Disclosure And Use Agreement from myself, Michael Lieberman and Catherine Petzinger.

Chris Frentrup will forward you copies of these Third-Party agreements from MCI WorldCom and Appendix B signed by himself and by John Donovan.

We look forward to reviewing the data on June 23, 1999. Thanks again for your assistance.

Sincerely,

Richard N. Clarke
AT&T

cc: Craig Brown, FCC

**AT&T**

Room 5462B3

295 North Maple Avenue
Basking Ridge, NJ 07920

June 17, 1999

Mr. Albert Shuldiner
Vinson & Elkins, L.L.P.
1445 Pennsylvania Avenue, NW
Washington, DC 20004

**Re: Proprietary Data submitted to the FCC in:
CC Docket No. 96-45 – Universal Service/Proxy Cost Models
CC Docket No. 97-160 – Forward-Looking Cost Mechanism**

Dear Mr. Shuldiner:

Thank you for agreeing to provide us with a copy of Aliant's proprietary-filed data. I am enclosing Protective Order declarations from all of our representatives who may have occasion to inspect these data. Could you please mail the documents to:

Mr. John C. Donovan
Telecom Visions, Inc.
11 Osborne Road
Garden City, NY 11530
516-739-3565

Thanks again for your assistance.

Sincerely,

Richard N. Clarke
AT&T

cc: Craig Brown, FCC

July 9, 1999

Mr. Greg McElheran
Corporate Counsel
Lucent Technologies
100 NE Loop 410 – Suite 1300
San Antonio, TX 78216

**Re: Proprietary Data submitted to the FCC in:
CC Docket No. 96-45 – Universal Service/Proxy Cost Models
CC Docket No. 97-160 – Forward-Looking Cost Mechanism**

Dear Mr. McElheran:

Thank you for stating that Lucent Technologies does not intend to intervene in this matter or seek additional protective measures beyond those stated in the FCC's Protective Order. I am enclosing copies of the declarations of those individuals that will be inspecting this information.

Sincerely,

Richard N. Clarke
AT&T

Attachments

cc (w/o atts.): Hope Thurrott, SBC
Jay Bennett, SBC
Craig Brown, FCC